

Aaron.Kelson Comment

Comment Info: =====

General Comment:I wish to comment on the proposed Dairy Product Mandatory Reporting regulation. Requiring all producers of dairy products to report price, quality, and

moisture content information to federal agencies would restrict competition in the industry. This will results in several unintended negative consequences. Small-scale producers whose overall quality may, in fact, be superior to that achieved by larger-scale producers will be required to pay high compliance costs, greatly increasing the cost-per unit sold. Large-scale producers can distribute compliance costs over a much greater volume, resulting in small increases to per-unit cost. Prior to the implementation of these proposed regulations I would like to see cost/benefit analyses for different levels of producers rather than just for the industry as a whole.

Another unintended consequence of this proposed regulation would be to further reduce the ability of true family farms to be sustained by interchanges with the communities they serve. Rural America has long been experiencing a dramatic decline in population, driven in a significant way by regulation in the agricultural

sector. These regulations will only further that decline, weakening the American ideal as championed by Thomas Jefferson and others. Producers and willing consumers should be allowed to conduct transactions without government oversight if consumers have access to reliable information about the production methods used. When production is limited, with a local population being served, direct access to production methods is possible. Regulation, promoted as being in the public interest, is often a poor substitute for direct access. By choosing to regulate in all cases we would be eliminating the preferred method of conducting business.

Numerous groups of people work together to produce some of their food, including dairy products. Members of a food-producing cooperative especially should not be subject to intrusive government oversight.

I urge you not to implement these regulations except as they would apply to truly industrial level dairy production.

Aaron Kelson, Ph.D.